

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

**THOMAS JEFFERSON CROSSINGS  
HOMEOWNERS' ASSOCIATION, INC.  
PLAINTIFF,**

**v.**

**MANSOUR ETEMADIPOUR and  
NICK ETEMADIPOUR,  
DEFENDANTS.**

**Case No: 6:22-cv-16-NKM**

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

For the reasons set forth in the accompanying brief, Defendants bring this Motion under Rule 56(a) of the Federal Rules of Civil Procedure for summary judgment on Plaintiff's claims of Breach of Contract, with regard to 1060 Governors Lane Forest, VA (Count I), 1072 Governors Lane Forest, VA (Count II), and 1080 Governors Lane Forest, VA (Count III). The pleadings and discovery show that no genuine issue of material fact exists as to whether Defendants breached their contract with the Plaintiff, and as to whether Plaintiff has suffered damages as a result. Accordingly, Defendants do hereby request that this Court enters an Order granting summary judgment in favor of the Defendants, and disposing of this case in its entirety.

Respectfully submitted,

**MANSOUR ETEMADIPOUR and  
NICK ETEMADIPOUR,  
Defendants.**

BY: **s/Brenda E. Castañeda**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of August, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF system for filing, which will transmit a Notice of Electronic Filing to the following ECF Registrants:

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